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CLERK U S DISTRICT COURT	
DISTRICT OF ARIZONA	
BY	DEPUTY

1 Robert Hernandez McDonald Jr.
 2 535 S Grand St.
 3 Mesa, Arizona 85210
 Pro-Se

IN THE UNITED STATES DISTRIC COURT FOR THE DISTRICT OF ARIZONA

5 PHOENIX DIVISION

6 CV-16-00700-PHX-DMF

7 Robert Hernandez McDonald Jr.,) Civil Action No.:
 8 Plaintiff,)
 vs.)
 10 Transunion, LLC,)
 11 Defendant)
 _____)

13 Plaintiff Robert Hernandez McDonald Jr. alleges as follows:

14 The Parties

16 1. At all times herein after mentioned, plaintiff is and was a
 17 resident of Mesa, Arizona.

18 2. Plaintiff is a victim of identity theft.

19 2. Defendant, Transunion, LLC., is a Limited Liability
 20 Corporation incorporated under the laws of California and having
 a main office at 555 W Adams St. Chicago, IL 60661.

21 3. Defendant, Transunion, LLC, is registered with the Arizona
 22 Corporation Commission as a Foreign Limited Liability
 23 Corporation doing business in Arizona and has designated a
 24 registered agent: Prentice-Hall Corp System 2338 W. Royal Palm
 Rd. Sutie J Phoenix, AZ 85021.

25 Jurisdiction

26 4. The Court has jurisdiction over this action pursuant to 15
 27 U.S.C. § 1681 et seq., the "Fair Credit Reporting Act (FCRA) and
 28 15 U.S.C. §§ 1692-1692p, the "Fair Debt Collection Practices
 Act."

1 Defendant's Statutory Violations

2 5. The Defendant is reporting derogatory information about
3 Plaintiff to one or more consumer reporting agencies (credit
4 bureaus) as defined by 15 U.S.C. § 1681a.

5 6. Plaintiff has disputed the accuracy of the derogatory
6 information reported by the Defendant to the Consumer Reporting
7 Agency Experian on four separate occasions via certified mail.
See attachments.

8 7. Defendant has not responded to Plaintiff's four letters of
9 dispute by providing evidence of the alleged debt to Plaintiff
nor to the Consumer Reporting Agency Experian.

10 8. Defendant has not provided notice of this disputed matter to
11 the credit bureaus and is therefore in violation of 15 U.S.C. §
1681s-2 which requires this notice.

12 9. Defendant has failed to comply with 15 U.S.C. § 1692g in that
13 it has not within 5 days of Plaintiff's initial communication
14 (nor at any other time) sent Plaintiff written documentation of
15 the amount of the debt, the name of the original creditor nor
other information required by the Fair Credit Reporting Act.

16 10. Defendant has failed to complete an investigation of
17 Plaintiff's written dispute and provide the results of an
18 investigation to Plaintiff within the 30 day period as required
by 15 U.S.C. § 1681s-2.

19 11. Defendant has not notified Plaintiff of any determination
20 that Plaintiff's dispute is frivolous within the 5 days required
by 15 U.S.C. § 1681s-2, nor at any other time.

21 12. Defendant has placed the following information on
22 Plaintiff's credit bureau: Account Information Disputed by
23 Consumer, Meets FCRA requirements.

24 13. Defendant states on disputed items the item remains
25 unchanged from the processing of your dispute on Month/Year.
26 Defendant still reports inaccurate data after acknowledging that
the dispute meets FCRA requirements.

27 14. Defendant refuses to acknowledge that personal information
28 listed such as address are incorrect and does not remove them
citing that because the plaintiff allegedly received mail or

1 data reporter reports the information as accurate despite the
2 plaintiff being a victim of identity theft.

3 Prayer for Relief

4 12. WHERFORE,

5 Plaintiff seeks a reasonable and fair judgment against defendant
6 for willful noncompliance of the Fair Credit Reporting Act and
7 seeks his statutory remedies as defined by 15 U.S.C. § 1681n and
demands:

8 \$1,000 for actual damages

9 \$125,000 in punitive damages

10
11 Permanent injunction against the Defendant from reporting
12 derogatory information about Plaintiff to Consumer Reporting
Agencies (credit bureaus)

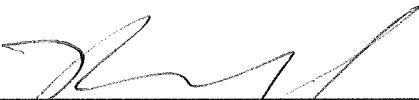
13 An order from this Court to delete all previously disputed
14 information stated on the credit bureau report including
addresses, telephone numbers and accounts.

15 Permanent injunction against Defendant for selling this alleged
16 debt to any other party

17 Any further relief, which the court may, deem appropriate.

18 Respectfully Submitted,

19
20 Dated this 11 of March, 2016

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22 
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